

## **To The federal Communications Commission**

**re WT Docket No: 10-119**

I am Robert A. Davisson with primary residence in Bradenton, Florida and a summer home in Warsaw, Missouri. I retired from AT&T after 31 years service, and worked in communications in both military and post-retirement positions. I hold a Missouri Certified Emergency Manager, Level 2 designation (MoCEM), have been trained as a DHS OEC All Hazards Type III Communications Unit Leader (COML). I am a CERT instructor and also hold Amateur Extra class and GMRS licenses. I'd like to give you my viewpoint of this proposal from an emergency communications practitioner perspective.

At the urging of our political leaders and professional first responders, today's communities are searching for ways to prepare to be more self-sufficient during the initial period following a crisis event. These events often disable or overload commercial communications leaving citizens no way to communicate over neighborhoods that are spread over blocks or more – or to reach response authorities for help. I have worked with large and small CERT teams on their communications plan and protocol, and often see their frustration as they try to use FRS over distances and in conditions not suited for half-watt dummy load antenna radios. I believe restricting repeater use would lessen the value of the service and allowing GPS/USNG coordinate transmission would enhance it

GMRS service – as written – could be the best answer for many of these well intentioned, well trained teams except for the fact that it is cost prohibitive at the current rate. I am well aware

of the efforts of organized steering groups to keep the current licensing scheme in place to protect GMRS against evolving into the wasteland that "CB radio" has become.

As you know, CB, which is AM HF, has much different characteristics than FM UHF. I don't believe we risk the spectrum pollution seen with CB with GMRS, so I believe licensing by rule is doable and desirable in this case.

At a minimum, if you rule to leave current licensing and fee protocol in place, I would implore you to exempt from fee any credentialed government, non-government or faith-based organization disaster response or recovery group. I suggest a single entity license with trustee would well serve the national interest

/signed/

**Robert A. Davisson, MoCEM**  
**1169 Cane Mill LN**  
**Bradenton, Florida 34212**  
**KA4BOB**  
**WPUZ511**